

AB:DR

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

21-MJ-1110

JED JOHNSON,

(T. 18, U.S.C., § 2252(a)(4)(B))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MICHAEL BUSCEMI, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation (“FBI”), duly appointed according to law and acting as such.

On or about September 29, 2021, within the Eastern District of New York, the defendant JED JOHNSON did knowingly and intentionally possess matter containing one or more visual depictions, to wit: images in digital files contained within electronic devices provided to law enforcement by the defendant, and which visual depictions had been mailed, and shipped and transported in, and using a means and facility of, interstate and foreign commerce, and which were produced using materials which had been mailed, and so shipped and transported, by any means, including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Section 2252(a)(4)(B)).

The source of your deponent's information and the grounds for his belief are as follows¹:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since 2015. Since September 2019, I have been assigned to the Child Exploitation and Human Trafficking Task Force. I have investigated numerous violations of criminal law relating to the sexual exploitation of children. I have gained expertise in this area through training in classes and daily work related to conducting these types of investigations. As part of my responsibilities, I have been involved in the investigation of numerous child pornography cases, reviewed hundreds of thousands of photographs depicting children being sexually exploited by adults and executed premises search warrants and search warrants for electronic communications and social media accounts used to facilitate child exploitation offenses. Through my experience in these investigations, I have become familiar with methods of determining whether a child is a minor.

2. I have personally participated in the investigation of the offenses discussed below. I am familiar with the facts and circumstances of this investigation from my personal participation in the investigation, my review of documents, my training and experience and discussions I have had with other law enforcement personnel concerning the

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

creation, distribution and proliferation of child pornography. Additionally, statements attributable to individuals herein are set forth in sum and substance and in part.

3. On the morning of September 29, 2021, I, along with other members of law enforcement, went to the home of the defendant, which is located in Queens, New York. Upon arriving at the location, we knocked on the door of the residence and the defendant answered the door.

4. We proceeded to ask the defendant if he was the user of a gmail address (the “subject email address”) that Google, in or about June 2020, had identified contained images and one video of child pornography. I have since, pursuant to a search warrant, reviewed the content of the subject email address and confirmed that images and videos of child pornography were contained within that email address. The defendant confirmed that he was the user of the subject email address.

5. After confirming his use of the subject email address, law enforcement proceeded to ask the defendant if we could review his cell phone and if the defendant had any other electronic devices in the house. The defendant informed law enforcement that in addition to his cell phone he also had a tablet in the home. The defendant provided law enforcement consent to search both devices.

6. I then reviewed both the cell phone and tablet and confirmed that each device contained images of child pornography, including some images of infants. Specifically, there were, among others, images of: (1) a newborn infant laying with an erect penis by the infant’s mouth; (2) a blonde hair pre-pubescent female no more than six years of

age facing the camera with her legs spread and genitals exposed; and (3) a pre-pubescent female no more than seven years of age with her legs over her head and genitals exposed.

7. The defendant then provided a voluntary confession to law enforcement, during which he explained that he searched for and downloaded the child pornographic images from the internet onto his cell phone and tablet devices.

WHEREFORE, I respectfully request that JED JOHNSON be dealt with according to law.

/s/ Michael Buscemi

MICHAEL BUSCEMI
Special Agent
Federal Bureau of Investigation

Sworn to before me by telephone this
29th day of September, 2021

Lois Bloom

THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK